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United States District Court For The Northern District Of Georgia

Kavita P. Walker, Clerk
By: Deputy Clerk

Julia M Robinson and Kendall J. Hall

2451 Cumberland Pkwy SE Suite 3320 Atlanta Cobb Ga 30339

CASE NO: 23-CV-05655-MHC

Plaintiffs: Julia M Robinson and Kendall J. Hall

Defendants: Apple Inc. And Dr. Brittny Mason Hinman

OPPOSITION TO DEFENDANT APPLE INC. MOTION TO DISMISS/ NOTICE OF HEARING

What is a Joinder? The act of bringing multiple legal issues together under the same lawsuit. A joinder is the act of "joining" several legal issues together in the same lawsuit. A joinder allows for two or more issues to be heard during one hearing or trial, so as to make the process run more smoothly, and to help ensure the outcome is fair for all involved. Permissive Joinder: Permissive joinder is covered in Rule 20 of the Federal Rules of Civil Procedure. A permissive joinder allows two or more parties to join an action if they each have a claim that arose from the same incident. Similarly, a permissive joinder is allowed, if there is a common question of law or fact that pertains to all of the parties' claims. Compulsory joinder is governed by Rule 19 of the Federal Rules of Civil Procedure, which makes it mandatory that some parties be joined. Parties that must be joined are those necessary and indispensable to the litigation. The rule includes several reasons why this might be true, including if that party has an interest in the dispute that they will be unable to protect if they are not joined. For example, if three parties each lay claim to a piece of property and the first two sue each other, the third will not be able to protect their (alleged) interest in the property if they are not joined. Another circumstance is when a party might end up with inconsistent obligations, for example they may be required by two different courts to grant two different parties exclusive rights to the same piece of property. These (and similar) issues are avoided by joining the parties in one lawsuit. However, while "necessary" parties must be joined if that joinder is possible, the litigation will continue without them if joinder is impossible, for example, if the court does not have jurisdiction over the party. By contrast, if "indispensable" parties cannot be joined, the litigation cannot go forward. Courts have some discretion in determining what parties are indispensable, though the Federal Rules provide some guidelines. Joinder of claims:

Joinder of claims refers to bringing several legal claims against the same party together. In the U.S. federal court system, joinder of claims is governed by Rule 18 of the Federal Rules of Civil Procedure. This rule allows claimants to consolidate all of their claims that they have against an individual who is already a party to the case. Claimants may bring new claims even if these new claims are not related to the claims already stated; for example, a plaintiff suing someone for breach of contract may also sue the same person for assault. The claims may be unrelated, but they may be joined if the plaintiff desires. (b) When Joinder Is Not Feasible. If a person who is required to be joined if feasible cannot be joined, the court must determine whether, in equity and good conscience, the action should proceed among the existing parties or should be dismissed. The factors for the court to consider include: (1) the extent to which a judgment rendered in the person's absence might prejudice that person or the existing parties; (2) the extent to which any prejudice could be lessened or avoided by: (A) protective provisions in the judgment; (B) shaping the relief; or (C) other measures; (3) whether a judgment rendered in the person's absence would be adequate; and (4) whether the plaintiff would have an adequate remedy if the action were dismissed for nonjoinder. "Equity and good conscience. " Judges are encouraged to be fair and creative. The parties/Future Defendants whom participated in involuntary servitude/war crimes/human trafficking/assaults/harassment/nuisances arose from fraudulent medical notes/medical records illegally obtained that are false/patient abuses against The Plaintiffs will be/can be added as Joinder Defendants in this lawsuit with The Plaintiff and her daughter that she is representing them both in this case. Therefore the joinders arose from the same initial incident from the doctors fraudulent medical notes/records illegally placed in The Plaintiffs medical history to get illegal medical exemptions for illegal military weapons testing/assaults/medical battery /involuntary servitude/ human trafficking during the COVID-19 Pandemic in year 2020 which was during both Plaintiffs stay at Memorial Healthcare Systems Miramar Hospital in year 2020 including all of the other crimes committed against The Plaintiffs mother prior to The Plaintiffs daughter being born and after both Plaintiffs moved to The State of Georgia. The Plaintiffs are clearly two people which makes them eligible to have multiple defendants under the rule for joinder that says two or more. What is a motion to dismiss? A motion to dismiss is a formal request for a court to dismiss a case. FRCP Rule 12 FRCP 12 is often invoked when filing a motion to dismiss. 12(b) in particular is frequently used. All 7 sub- sections of 12 (b) may be used as grounds for a motion for dismissal. These include dismissals for: (b) (1) a lack of subject-matter jurisdiction (b) (2) a lack of personal jurisdiction (b) (3) improper venue (b) (4) insufficient process (b) (5) insufficient service of process (b) (6) failure to state a claim upon which relief can be granted (b) (7) failure to join a party under rule 19. The Plaintiffs stated claims upon which relief can be granted in their complaint application and attachments. The Defendants can gladly read it again and

both parties can argue their pleadings at a hearing in front of The Judge in court. The Plaintiffs object to The Defendants entire motion to dismiss. Therefore The Defendant' has/had no legal basis to file a motion to dismiss against The Plaintiff in this case and only filed that motion to intentionally to delay trial. The Black African American Pro Se' Plaintiffs complaint isn't a shot gun pleading, their complaint is supported by facts, and The Plaintiffs gave The Defendant' s fair notice of what their claims were and the grounds upon which they rest. The Plaintiffs submitted a preponderance of factual claims that were clearly supported by a preponderance of Decisional Law [precedent Case Law] with admissible exhibits/ documents to support all of her claims within this Opposition/Objections/Response and all other Oppositions/Objections/Responses to other Defendants in this complaint thus far therefore all of the Plaintiffs opposition pleadings are deemed affirmed and the relief sought within all of their Pleadings/and or Complaint submitted should be granted by this Court. The Plaintiffs Object to The Defendants Apple Inc. Motion To Dismiss and is ready for trial. The Plaintiffs thank GOD this decision isn't up to The Defendants Attorneys in This Case.

On Exhibit F1 for The Plaintiffs Opposition/Objections/Response motion for Florida Atlantic University (FAU) an email copy sent to DHHS OCR from The Plaintiff Julia M. Robinson letting them know she did administrative complaints and why dated October 25, 2021. Exhibit F2 is a print out from Piedmont Hospital in Peachtree City Ga. Dated March 5, 2022 after The Plaintiff did complaints with DHHS OCR. This was a suggestion and subliminal threat that The Plaintiff should call for crisis help for mental illness ironically after The Plaintiff did complaints with DHHS OCR. This was in fact a threat because The Plaintiff did complaints with DHHS OCR and THEY KNEW A LAWSUIT WAS SOON COMING AFTER FROM THE PLAINTIFF. This is also proof that The Defendants has/had knowledge and time to prepare for lawsuits coming from The Plaintiff. Under 1983 Constitutional Violations lawsuits The Plaintiff doesn't have to give a federal department warning that they are filing this kind of lawsuit. The Defendants mentioned in their motion to dismiss that The Plaintiffs filed lawsuits before, The Defendants attorneys know and can see in PACER everything they want and need to see for anything legal for cases. The Defendants had knowledge of The Plaintiffs filing before and The Defendants had time to prepare for This current lawsuit. No attorney can say they didn't have time to prepare, they all knew even if they pretended like they didn't know, they knew. Attorneys know when Americans go Pro Se', especially if The American is Black African American.

Exhibits A1 through A4 is a receipt copy from USPS tracking number 9505-5065-9661-4113-8180-12 and a copy of The Plaintiffs Original Opposition/Objections/Response to Memorial Healthcare Systems and Mariana ~~Danet~~ M.D. motion to dismiss that was sent through USPS to be filed with this court. The Plaintiff didn't make it to The Federal Courts yesterday to get inside the building in time to drop her motion in Dropbox, so she mailed it.

The Human Trafficking PIMPS at Memorial Healthcare Systems assumed that all involved in these crimes against The Plaintiffs would make millions of dollars for years to come off of their Black African American bodies/back by creating false medical records/notes to match other medical professional false notes/records to desperately make The Plaintiff Julia M. Robinson appear as if she had depression, anxiety, and debilitating diseases while discrediting her for The State of Florida in hopes that Kristian J. Hall wouldn't prevail Pro Se against the Sunny Isles Police Department after they WERE PAID TO ARREST HIM ILLEGALLY AND CHARGED HIM ILLEGALLY WITH HIS OWN PAIN MEDICATION WHICH IS AGAINST THE LAW IN THE STATE OF FLORIDA. Exhibits B1 through B14 are medical records/notes from Mariana ~~Danet~~ M.D. and other medical professionals that wrote false notes/records. On Exhibit B3 The Plaintiff mentioned this in her one of her cases that is filed with The Court of Appeals against FedEx to doctor Brittany Mason ~~Hirner~~. The Plaintiff told her that she was attacked and it was done because she came forward to tell what she saw. The Plaintiff didn't tell this doctor that people were trying to poison her. This doctor said that as if and or was trying to make it seem like The Plaintiff was explaining that she was paranoid. This doctors statement about " that the people she was testifying against was trying to poison her " makes it look like The Plaintiff is paranoid by her using the term " trying to poison her ". It comes off as if a person is explaining that people are after them. They didn't try to, THEY DID ATTACK THE PLAINTIFF WITH BIOCHEMICAL WEAPONS. The Defendants worked in concert which is a MEETING OF THE MINDS, WHICH IS CONSPIRACY. The Defendants did this because The Plaintiff is Black African American which is racial discrimination. Under this Behavioral Health Consult this hospital and medical staff said that The Plaintiff and or checked a box that said that The Plaintiff looked bizarre and that she was preoccupied after The Plaintiff literally just had her daughter. The Plaintiff NEVER agreed to no psychiatric evaluation randomly from a stranger doctor that came in her room unannounced. These criminals did this to over all discredit The Plaintiffs BLACK WORD ON PAPER. These criminals at this hospital also was calling the hospital room phone trying to get her to agree to seeing and speaking with a social worker while The Plaintiff was in THE ICU. These criminals were so extremely greedy for research dollars that they were willing to do anything, even if it cost a Black African American woman her peace of mind right after she had her daughter and their lives. These criminals knew that by them

doing what they all decided to participate in, this would follow The Plaintiff no matter where she went in The United States of America and could make The Plaintiff appear as if she had mental health issues by illegally subjecting her to illegal medical research through exemptions without her consent. That's how other human trafficking PIMP doctors, hospitals, Universities, and colleges can and did participate and make money off of The Plaintiffs by using these same FAKE MEDICAL RECORDS/NOTES. The Plaintiff and her daughter could've passed away from these criminals subjecting The Plaintiffs to illegal racist extremely dangerous research without her consent. The Plaintiff will never forgive these racist demons for what they did to her and her daughter for The State of Florida and for The Myara Family. The Plaintiffs objects to The Defendants entire motion to dismiss.

Exhibits C1 through C5 is evidence from Memorial Healthcare Systems medical records showing how this hospital was trying to Baker Act/Marchman Act The Plaintiff on Exhibit C1 and C2. On Exhibit C4 is how they were trying to accomplish this crime by Dr. York A. Hernandez- Rodriguez writing in The Plaintiff medical notes/records that he has been prescribing her opioids and acetaminophen since 9/27/2014 up until 11/25/2020. The Plaintiff has never been this doctors patient, and The Plaintiff never knew of this doctor until she saw his name in her medical records/notes. What are the Nuremberg Trials? Also under these same exhibits (C5) this hospital put in The Plaintiff medical notes/records that she was a gaucher disease carrier which is another way illegally they got exemptions to perform illegal surgeries by writing false genetic testing notes of debilitating diseases in The Plaintiffs medical records/notes. The Defendants doesn't have credibility none what so ever.

Exhibits D1. Through D5. Is evidence of this hospital taking The Plaintiffs cord blood without her consent and how the nurse admitted that Dr. Brittany Mason Hirner told her to take The Plaintiffs placenta to pathology even after The Plaintiff told this same doctor and hospital and even signed a paper stating that she was taking her placenta home. Also in these exhibits they are saying that The Plaintiffs rights to privacy was maintained when in fact it wasn't. The Plaintiffs medical records/notes were passed around and exposed so that this hospital could get as many as medical professionals possible on board to discredit The Plaintiffs BLACK WORD ON PAPER because of Kristian J. Halls cases at that time. This is also in fact a HIPPA VIOLATION.

Exhibits E1 through E3 is evidence of The Plaintiff being in the ICU and The Plaintiffs daughter being in the nursery on E1. On E2 this is evidence of Dr. Brittany Mason ~~Hirner~~, prescribing/giving the orders for The Plaintiff Julia M. Robinson to be given Gabapentin to take orally. On E3 is evidence of Nurse Hannah Thompson explaining EXACTLY what was explained to her from The Plaintiff Julia M. Robinson and Kristian J. Hall. The Plaintiff thanks God for this nurse in particular, she was extremely caring, nice and attentive while The Plaintiff was in the ICU. The nurse that prepared The Plaintiff to have her daughter before she had her daughter was a Black nurse and she was extremely caring, nice, and attentive as well. Thank God for these nurses.

THE ENTIRE STATE OF FLORIDA WAS JEALOUS OF KRISTIAN J. HALL FOR GOING PRO SE' AND BECAUSE OF HIS EVIDENCE AND WITNESSES HE WAS LOOKING LIKE HE WAS GOING TO WIN. OUT OF DESPERATION AND GREED THE STATE OF FLORIDA SUBJECTED THE PLAINTIFF AND HER FAMILY TO MEDICAL EXPERIMENTS/RESEARCH SO THAT THEY WOULDN'T PREVAIL AGAINST POLICE DEPARTMENTS AND MUNICIPALITIES. THE PLAINTIFF WROTE FEDERAL DEPARTMENTS PRIOR TO HER DAUGHTER BEING BORN AND THIS WAS ALSO MURDER ATTEMPTS ON THE PLAINTIFFS LIVES AND KRISTIAN J. HALLS LIFE FOR EXERCISING HIS RIGHT TO REPRESENT HIMSELF AND NOT ALLOW ATTORNEYS AND THE STATE OF FLORIDA TO CONTINUE TO HAVE HIM JAILED ILLEGALLY FOR SOMETHING HE DIDN'T DO. THE PLAINTIFF FEELS SORRY FOR INNOCENT BLACK AND LATINO AMERICANS THAT WENT PRO SE' AND THEIR WITNESSES IF ANY. SINCE THESE WAR CRIMES WERE CARRIED OUT BY THE DEFENDANTS IN THE STATE OF FLORIDA, JULIA M. ROBINSON BELIEVES THIS HAPPENS ALL THE TIME TO BLACK AND LATINO AMERICAN WITNESSES THAT STEP UP AND TELL ON POLICE DEPARTMENTS AND MUNICIPALITIES IN THE STATE OF FLORIDA ESPECIALLY IF THEIR JUDGE WAS TERESA MARY POOLER AND THEM AND THEIR WITNESSES WERE ILLEGALLY LOCKED UP AT METRO WEST DETENTION CENTER AND IN MENTAL HOSPITALS FOR SIMPLY EXPLAINING THEIR SYMPTOMS TO DOCTORS THAT WERE IN FACT ARTIFICIALLY INDUCED BY USE OF ILLEGAL SURGERIES AND SUBJECTION TO ILLEGAL EXPERIMENTS WITHOUT CONSENT FROM THE VICTIMS DESPERATELY ATTEMPTING TO DISCREDIT THEM AND FURTHER VIOLATE THEIR AMERICAN CONSTITUTIONAL RIGHTS TO SAVE GOVERNMENT JOBS AND TO SAVE THEMSELVES FROM PUBLIC SCRUTINY AND HUMILIATION BECAUSE OF CRIMES COMMITTED AGAINST INNOCENT BLACK AND LATINO AMERICANS ON AMERICAN SOIL.

Under the First Amendment- 1.8.5 Fundamental Freedoms, Freedom of Association, and Intimate Association The Plaintiff has an intimate association/relationship with her

daughter/child who's rights while at this hospital were deprived. The Plaintiff loves her children unconditionally and is fighting legally to make sure her children understands the importance of knowing their rights as AMERICANS. There are NO ATTORNEYS that will file FTCA OR 1983 Lawsuits on the behalf of The Plaintiffs because they are BLACK AFRICAN AMERICANS that survived war crimes committed against them. Attorneys that The Plaintiffs mother Julia M. Robinson reached out to all told her and her family no they will not represent her and her daughter. No attorneys are going to turn in evidence that shows the courts all of why this lawsuit has been filed. No attorneys are going to dedicate effort, time, and compassion into expressing to this court what happened to The Plaintiffs on paper like The Plaintiffs mother, The Plaintiff lost faith in attorneys and ONLY HAS FAITH IN GOD. The Plaintiffs daughter only has GOD AND HER PARENTS and FAMILY to rely on to make sure she gets justice for what happened to her without her parents consent. The Plaintiff will serve subpoenas To The Defendants to get phone calls, video footage, audio footage, medical research records, and other doctors and professors that made money off of The Plaintiffs and who was at the hospital while The Plaintiff was delivering her baby. The Plaintiffs will retrieve Memorial Healthcare systems and Mariana ~~Danet~~ M.D. communications with FIRST CLASS OBGYN that Dr. Brittany Mason ~~Hirner~~ was working for and is literally in the same parking lot of Memorial Miramar Hospital. The Plaintiffs object to both Defendants Memorial Healthcare Systems and Mariana ~~Danet~~ M.D. motions to dismiss statement about The Plaintiffs mother can't represent her when the LAW literally says she can under a FTCA and 1983 Lawsuit. The Plaintiff will continue to represent her daughter in this case Pro Se', The Plaintiff Julia M. Robinson is the only person that has her daughters best interest in this case. The Plaintiff isn't sure why was her previous cases brought up in Mariana ~~Danet~~ M.D. attorneys motion to dismiss, since it was brought up The Plaintiff will discuss. The attorneys that are representing The Defendants can gladly look in PACER to see that two of her previous cases are filed with The Court of Appeals in Atlanta Georgia and this case is a refile because The Plaintiffs case was dismissed without prejudice. The Plaintiff is requesting a hearing with this court so that The Plaintiff can gladly go over her objections in person, that way no attorneys can say they don't understand something in her lawsuit or in her opposition motions.

Clark v. Bosher, 514 F3d 107 1st Cir 2008 under The Due Process Clause under The Fourth Amendment parents have a Fundamental constitutional liberty interest in the care, custody and control of their children which amounts to intimate association with their child ~~Troxel v. Granville~~ 530 U.S. 57, 65 (2000). The Plaintiff has a constitutional right to represent herself and her daughter in this case PRO SE' without the help any attorney to sabotage her cases for political racist favors to PR CHAMPAIGN FOR POLITIANS INVOLDED AND PRIVATE

CORPORATIONS THAT PAID OUT UNDER THE TABLE MONIES TO MAKE THE PLAINTIFFS CASES GO AWAY WHICH WILL ASSIST THEM IN ON ESCAPING LIABILITY. THE PLAINTIFF ISN'T FORKING OVER HER CASES TO NO ATTORNEY. THE PLAINTIFF IS SMOKE FREE, DRUG FREE, AND COMPETENT AND IS OVER QUALIFIED TO CONTINUE TO REPRESENT HERSELF AND HER DAUGHTER. CAN THE DEFENDANTS ATTORNEYS SAY THE SAME ABOUT THEMSELVES? THE ATTORNEYS THAT WROTE THIS MOTION TO DISMISS SAID THE PLAINTIFF ISN'T QUALIFIED. THE PLAINTIFF IS QUALIFIED ENOUGH TO KNOW WAY BETTER THAN MOST, THAT'S WHY SHE FILED THIS LAWSUIT BECAUSE SHE CAN'T BE PLAYED. AT THE END OF THE DAY THE DEFENDANTS ATTORNEYS ARE STRANGERS TO THE PLAINTIFFS. THE PLAINTIFF JULIA M. ROBINSON AGAIN OBJECTS TO THE DEFENDANTS MOTION TO DISMISS.

Section 1983 provides an individual the right to sue state government employees and others acting "under color of state law" for civil rights violations. The conduct complained by The Plaintiffs was committed by The Defendants Memorial Healthcare Systems and Mariana Dannet M.D. was acting under the color of state law; and The Defendants conduct deprived The Plaintiffs of their constitutional rights listed on The Plaintiffs attachment for their complaint application filed with this Court. The Plaintiffs Complaint isn't a shoot gun pleading. The Plaintiff answered all of the questions with added attachments for her and her daughters complaint and listed claims for which this Court may grant relief. Under all of the circled questions attached again to this motion. Attorneys can't just randomly say pro se' Plaintiffs aren't stating claims for which relief can be granted after The Pro Se' Plaintiff filled out The Pro Se' complaint form and answered all questions with attachments just because The format on The Pro Se' complaint form is different from how Attorneys write up lawsuits. The Pro Se' Plaintiff Complaint is completely filled out properly with all questions answered that shows this Court that The Plaintiffs Complaint isn't a shotgun pleading and that The Plaintiff answered all of the questions properly which clearly states claims for which relief can be granted. Under II. A. The question states on page three(3) of six(6) of the pro se' federal complaint form: Are you bringing suit against (CHECK ALL THAT APPLY) The Plaintiff checked both boxes, Federal Officials (A BIVENS CLAIM) and State Or Local Officials (a § 1983 CLAIM). Under II. B, and C, The Plaintiff answered both questions on attachments that this court copies of that show which constitutional rights that were violated in this case which is also state claims which relief can be granted. Under II.D. The Plaintiff answered the question and stated claims for which relief can be granted. Under III. A, B, and C The Plaintiff stated claims for which relief can be granted. Under IV. And V. The Plaintiff stated Injuries, Claims, and Relief that can be granted by this Court awarded to The Plaintiffs. Universities, Colleges, and Hospitals can be sued under 42 U.S.C § 1983 and

aren't exempt/have immunity like The Defendants said. The Plaintiff won't allow no attorney to use her lawsuits to bail out coworkers and college alumni buddies and sabotage her cases for political advances and favors of whom ever is paying. Whom ever was involved in these human trafficking crimes The Plaintiff wishes for them to be arrested and for The United States Government to strip them of their professional medical credentials for SCAMMING AND FOR USING RESEARCH AS WAR CRIME WEAPONS TO HELP THE GOVERNMENT PREVAIL IN FRAUDULENT CRIMINAL CASES AGAINST INNOCENT AMERICANS WHILE PIMPING AMERICANS WITHOUT THEIR CONSENT DURING STATE EMERGENCIES/PANDEMICS. THE PLAINTIFFS OBJECTS TO THE DEFENDANTS ENTIRE MOTION TO DISMISS.

Julia M Robinson declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct " Executed on April 28, 2024



JULIA M. ROBINSON

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